UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

In Re: STORM, NEVADA-SPRINGS R. Debtors))
)

MOTION FOR EXTENSION OF TIME TO FILE CHAPTER 13 SCHEDULES AND OTHER REQUIRED DOCUMENTS

NEVADA-SPRINGS R. STORM, the Debtor, by counsel, move the Court as follows:

- 1. On July 18th, 2011, the Debtor filed a voluntary petition in bankruptcy which halted the execution sale of their real property.
- 2. The chapter 13 schedules, statement of affairs, statement of monthly income and disposable income calculation, and Chapter 13 plan and related motions are due on August 1st, 2011.
- 3. The Debtor will need additional time to prepare the statement and plan because of the need to get and obtain information about the debtors second income source and the status of any lessee on her premises.
- 4. The Debtor request that this court grant an extension to August 16th, 2011, seven (7) days prior to the meeting of creditors, to prepare and file their Chapter 13 schedules, statement of affairs, payment advices, statement of current monthly income and disposable income calculation, and chapter 13 plan and related motions, pursuant to Rules 1007(c) and 3015 of the Federal Rules of Bankruptcy Procedure.

NEVADA-SPRINGS R. STORM By Counsel

/s/ Nathan D. Baney, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of July, 2011, a true copy of the foregoing Motion for Extension of Time to File Chapter 13 Schedules and Other Required Documents was served on all relevant parties and the following pursuant to the Court's ECF noticing system or U.S. mail:

Thomas P. Gorman, Esq. 300 N. Washington Street, Suite 400 Alexandria, VA 22314

/s/ Nathan D. Baney___